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Counsel to the Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

ICAP ENTERPRISES, INC., et al.,

Debtors.<sup>1</sup>

No. 23-01243-WLH11  
(Jointly Administrated)

THIRD MONTHLY FEE  
APPLICATION OF BUSH  
KORNFELD LLP FOR  
ALLOWANCE AND PAYMENT  
OF INTERIM COMPENSATION  
AND REIMBURSEMENT OF  
EXPENSES FOR THE PERIOD OF  
DECEMBER 1, 2023 THROUGH  
DECEMBER 31, 2023

<sup>1</sup> The Debtors (along with their case numbers) are iCap Enterprises, Inc. (23-01243-11); iCap Pacific NW Management, LLC (23-01261-11); iCap Vault Management, LLC (23-01258-11); iCap Vault, LLC (23-01256-11); iCap Vault 1, LLC (23-01257-11); Vault Holding 1, LLC (23-01265-11); iCap Investments, LLC (23-01255-11); iCap Pacific Northwest Opportunity and Income Fund, LLC (23-01248-11); iCap Equity, LLC (23-01247-11); iCap Pacific Income 4 Fund, LLC (23-01251-11); iCap Pacific Income 5 Fund, LLC (23-01249-11); iCap Northwest Opportunity Fund, LLC (23-01253-11); 725 Broadway, LLC (23-01245-11); Senza Kenmore, LLC (23-01254-11); iCap Campbell Way, LLC (23-01250-11); UW 17th Ave, LLC (23-01266-11); VH Willows Townhomes LLC (23-01262-11); iCap @ UW, LLC (23-01244-11); VH 2nd Street Office, LLC (23-01259-11); VH Pioneer Village LLC (23-01263-11); iCap Funding LLC (23-01246-11); iCap Management LLC (23-01268-11); iCap Realty, LLC (23-01260-11); Vault Holding, LLC (23-01270-11); iCap Pacific Development LLC (23-01271-11); iCap Holding LLC (23-01272-11); iCap Holding 5 LLC (23-01273-11); and iCap Holding 6 LLC (23-01274-11); Colpitts Sunset, LLC (23-01432-11); CS2 Real Estate Development LLC (23-01434-11); and iCap International Investments, LLC (23-01464-11).

1 Bush Kornfeld LLP (the “Firm”) submits this Monthly Fee Application Request  
2 for Compensation and Reimbursement of Expenses for the Period of December 1, 2023  
3 through December 31, 2023 (“the Application” and the “Application Period”  
4 respectfully for work performed for the Official Committee of Unsecured Creditors  
5 (“Committee”). In support of the Application, the Firm respectfully represents as  
6 follows:

7 The Firm is counsel to the Committee. The Firm hereby applies to the court for  
8 allowance and payment of interim compensation for services rendered and  
9 reimbursement of expenses incurred during the Application Period.

10 1. The Firm billed a total of \$50,037.30 in fees and expenses during the  
11 Application Period. The total fees represent 89.00 hours during the period covered by  
12 this Application. The fees and expenses break down as follows:

Period	Fees	Expenses	Total
12/01/2023 to 12/31/2023	\$48,887.50	\$1,149.80	\$50.037.30

13  
14  
15 2. Accordingly, the Firm seeks allowance of interim compensation in the  
16 amount of a total of \$50.037.30 at this time. This total is comprised of \$48,887.50 (the  
17 fees for services rendered) plus \$1,149.80 (the expenses incurred). The Firm will only  
18 apply 80% of the fees paid to outstanding invoices and will hold the additional 20% of  
19 the fees in trust pending approval of such fees through a quarterly interim fee  
20 application.

21 3. This is the third monthly fee application of the Firm. Accordingly, to date,  
22 the firm has not been paid post-petition and is not holding any amounts in trust.  
23

1           4. Attached as **Exhibit A** to this Application is the name of each professional  
2 who performed services in connection with this case during the period covered by this  
3 Application and the hourly rate for each such professional. Attached as **Exhibit B** to  
4 this Application are detailed time and expense statements for the Application Period.

5           5. The Firm has served a copy of this Application on the applicable Notice  
6 Parties. The Application was mailed by first class mail, postage prepaid on or about  
7 January 17, 2024. Notice of the filing of this Application was served on the foregoing  
8 parties as well as any party who has requested special notice in these chapter 11 cases  
9 as of the date of this Notice.

10          6 Pursuant to this court's *Order Granting Debtors' Motion for Order*  
11 *Establishing Interim Fee Application and Expense Reimbursement Procedures* that was  
12 entered on or about November 17, 2023, ("Compensation Procedures Order"). the  
13 Debtors are authorized to make payment requested herein without a further hearing or  
14 order of this court unless an objection to this Application is filed with the court and  
15 served upon the Notice Parties within 14 calendar days after the date of mailing of the  
16 Notice of this Application. If such an objection is filed, the Debtors are authorized, but  
17 not direct to pay 100% of the uncontested fees and expenses without further order of  
18 this court. If no objection is filed, the Debtors are authorized, but not directed to pay  
19 100% of all fees and expenses requested in the Application without further order of the  
20 court; provided, however, that in either case, the Firm will hold 20% of the amount of  
21 the fees paid in trust pending approval of such fees through a quarterly interim fee  
22 application.  
23

1           7.     The interim compensation and reimbursement of expenses sought in this  
2 Application are not final. Upon the conclusion of these cases, the Firm will seek fees  
3 and reimbursement of the expenses incurred for the totality of the services rendered in  
4 these cases. Any interim fees or reimbursement of expenses approved by this court and  
5 received the Firm (along with any retainer) will be credited against such final fees and  
6 expenses and may be allowed by this court.

7           The Firm respectfully requests that the Debtors pay compensation to the Firm as  
8 requested herein pursuant to and in accordance with the terms of the Compensation  
9 Procedures Order.

10  
11           DATED this 17<sup>th</sup> day of January, 2024.

12  
13                           BUSH KORNFELD LLP

14  
15                           By /s/ Armand J. Kornfeld  
16                           Armand J. Kornfeld, WSBA #17214  
17                           Aimee S. Willig, WSBA #22859  
18                           Jason Wax, WSBA #41944  
19                           Attorneys for The Official Unsecured Creditors Committee  
20  
21  
22  
23

# EXHIBIT A

<b>Timekeeper</b>	<b>Rate</b>	<b>Total Hours</b>	<b>Total Fees</b>
Armand J. Kornfeld	\$625.00	42.30	\$26,437.50
Aimee S. Willig	\$525.00	27.60	\$14,332.50
Jason Wax	\$425.00	19.10	\$8,117.50
<b>Total</b>		<b>89.00</b>	<b>\$50,037.50</b>

# EXHIBIT B

**Bush Kornfeld LLP**  
601 Union St., Suite 5000  
Seattle, WA 98101-2373

Phone (206) 292-2110; Fax 292-2104  
Federal Tax I.D. #91-1560644

ICAP CREDITORS COMMITTEE  
[via email]

Invoice # 24345

In Reference To: OUR CLIENT MATTER NO: 2760-20231  
General

**TOTAL PROFESSIONAL FEES AND EXPENSES PER DETAIL BELOW** \$50,037.30

Professional services

			<u>Hours</u>	<u>Amount</u>
<u>ASSET ANALYSIS</u>				
12/1/2023	AJK	Review iCap documents re brokers, intercompany transfers.	0.60	375.00
12/2/2023	ASW	Review emails re litigation targets and forensic inquiries.	0.40	210.00
	AJK	Read summaries of witness interviews.	0.60	375.00
12/4/2023	JW	Review CRO's notes from former CEO interview.	0.20	85.00
12/5/2023	ASW	Video conference with Debtor and committee professionals.	0.70	367.50
12/8/2023	AJK	Email with J. Bender and S. Freeman re potential claims against third parties.	0.10	62.50
	AJK	Read summary of witness interview (.2); Telephone call with J. Bender re same and other third party claim issues (.4); Email with Committee professionals re same (.2).	0.80	500.00



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COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/11/2023	JW	Research 2nd Street and Pioneer properties property history.	0.20	85.00
	AJK	Telephone call with S. Freeman, J. Bender, M. Issa, J. Wax re potential third party claims approach, allocation of resources with CRO team, review of data.	1.00	625.00
12/12/2023	AJK	Email with J. Bender re interview of third party witness (.1); Participate in weekly planning, coordination and strategy call with CRO team and Committee team (.8).	0.90	562.50
12/15/2023	AJK	Read interview summaries with third parties (.4); Email with Committee team re real estate issues, third party issues and updating of information (.2); Telephone call with J. Bender re third party interviews (.2).	0.80	500.00
12/18/2023	AJK	Emails w/ L. Miller re Airlink (.1); Emails with Committee re same (.4); Telephone conference with S. Freeman re same (.2).	0.70	437.50
12/19/2023	AJK	Weekly call with CRO team re case issues (.7); Emails with L. Miller and J. Gurule re possible institutional investors (.1).	0.80	500.00
12/21/2023	AJK	Read summaries of interviews with third parties.	0.70	437.50
12/22/2023	AJK	Read summary of regulatory agency meeting (.2); Read interview with former iCap employees (.2).	0.40	250.00
		SUBTOTAL:	[ 8.90	5,372.50]
		<u>AUTOMATIC STAY</u>		
12/1/2023	AJK	Review case law re scope of stay re "common res"/source of recovery.	1.10	687.50

ICAP CREDITORS  
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			<u>Hours</u>	<u>Amount</u>
12/2/2023	AJK	Continue review of case law re scope of stay re common source of recovery (.7); Emails with J. Gurule and L. Miller re same (.2).	0.90	562.50
12/21/2023	JW	Begin researching issues related to scope of the automatic stay.	3.50	1,487.50
		SUBTOTAL:	[ 5.50	2,737.50]
		<u>DISCLOSURE STATEMENT AND PLAN PROCESS</u>		
12/6/2023	ASW	Research re plan/liquidating trust provisions and issues.	1.60	840.00
		SUBTOTAL:	[ 1.60	840.00]
		<u>FEES</u>		
12/8/2023	ASW	Begin work on Committee Professional fee application templates/forms.	0.80	420.00
	ASW	Review fees procedures order and local rules re fees.	0.40	210.00
12/12/2023	ASW	Review draft fee application templates and edits re same.	0.60	315.00
		SUBTOTAL:	[ 1.80	945.00]
		<u>FINANCING AND CASH COLLATERAL</u>		
12/19/2023	AJK	Emails with L. Miller/J. Gurule re DIP Budget review and reports (.4); Email with S. Freeman re same (.1).	0.50	312.50
		SUBTOTAL:	[ 0.50	312.50]

			<u>Hours</u>	<u>Amount</u>
<u>GENERAL ADMINISTRATION</u>				
12/1/2023	AJK	Emails with Committee member re iCap entity and related issues.	0.20	125.00
12/2/2023	AJK	Email with Committee member re specific case issue.	0.10	62.50
12/5/2023	JW	Attend weekly action item meeting of debtors' professionals and committee professionals.	0.80	340.00
	JW	Prepare for and attend weekly committee meeting.	1.40	595.00
	AJK	Draft agenda for Committee meeting (.2); Committee weekly conference call (1.4); Telephone call with S. Freeman re Committee issues follow-up (.3).	1.90	1,187.50
12/6/2023	JW	Review notes from CRO's interviews with former iCap employees Gannon and McEun.	0.40	170.00
12/7/2023	JW	Attend weekly meeting of committee professionals.	1.00	425.00
	ASW	Meeting with committee professionals re approaches to case substantive and procedural issues.	1.00	525.00
	AJK	Telephone call with S. Freeman and M. Issa re real estate issues and issues for Committee meeting (.5); Telephone call with B. Riley professionals, Committee counsel re weekly planning call/Committee ongoing work efforts (1.0); Emails with L. Miller and Committee professional team re miscellaneous issues (.3).	1.80	1,125.00
12/8/2023	ASW	Conference with A. J. Kornfeld re case administration issues and maximizing value of assets.	0.60	315.00
	AJK	Telephone call with L. Miller re miscellaneous pending issues in case (.4); Emails with Committee members re pending Committee issues and questions (.4).	0.80	500.00

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			<u>Hours</u>	<u>Amount</u>
12/9/2023	AJK	Telephone call with S. Freeman re allocation of tasks among Committee and CRO team, overall structure and implementation of case issues.	0.80	500.00
12/10/2023	AJK	Telephone call with J. Gurule re overall case issues and strategy, coordination between CRO and Committee professionals.	0.90	562.50
12/11/2023	JW	Call with committee professionals re: recent developments and strategy going forward.	1.00	425.00
	AJK	Email with J. Gurule re general case issues (.1); Telephone call with J. Gurule, L. Miller re approaching case strategy issues (.8).	0.90	562.50
12/12/2023	JW	Weekly action items call with debtor and committee professionals.	0.90	382.50
	ASW	Weekly call with Debtors and Committee professionals re ongoing case issues.	0.90	472.50
	JW	Attend weekly committee meeting.	2.70	1,147.50
	AJK	Emails with Committee members re pending case issues and related attachments (.6); Emails with J. Bender and S. Freeman re follow-up to CRO meeting issues (.1); Draft agenda for weekly Committee meeting (.6); Telephone call with S. Freeman re same and coordination for Committee meeting (.3); Email with Committee members and Committee professionals re meeting (.2); Emails with Committee re agenda and related documents (.2); Participate in extensive weekly Committee meeting with Committee members and professionals (2.7).	4.70	2,937.50
12/15/2023	JW	Attend weekly meeting of committee professionals.	1.30	552.50
	ASW	Weekly call with Committee professionals re tasks and issues.	1.30	682.50

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COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/15/2023	AJK	Email with Committee members re pending issues (.2); Work on Committee professional work list (.3); Weekly call with Committee professionals re organizing work flow and updating action item list (1.3); Review and revise Committee meeting minutes (3.).	2.10	1,312.50
12/18/2023	JW	Finalize and distribute meeting minutes from last week's committee meeting.	0.20	85.00
	AJK	Draft Agenda for Committee meeting (.2); Emails with Committee members re various pending issues (.2); Telephone conference with counsel for Committee member re specific issues (.2).	0.60	375.00
12/19/2023	JW	Attend weekly action items meeting with CRO's team and Committee professionals.	0.70	297.50
	JW	Conference with A. J. Kornfeld re: stay issues, committee communications, and historical real estate transactions	0.30	127.50
	JW	Attend weekly committee meeting.	2.10	892.50
	ASW	Attend weekly call with Debtor and professionals re overall case tasks.	0.70	367.50
	AJK	Emails with Committee members re pending case issues (.1); Finalize Agenda for Committee meeting (.1); Telephone conference with S. Freeman re discussion with Committee re real estate and other updates (.3); Weekly Committee call/meeting (1.9).	2.40	1,500.00
12/20/2023	JW	Attend hearing on motions to approve bidding procedures and independent directors.	0.40	170.00
	JW	Finalize committee meeting minutes from 12-19 meeting.	0.20	85.00
	AJK	Email with Committee professionals re pending schedule and work issues (.1); Review and revise meeting minutes (.2); Telephone conference with	0.80	500.00

ICAP CREDITORS  
COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
		counsel for Committee member re pending issues (.3); Emails with Committee members re follow up re pending issues (.2).		
12/21/2023	JW	Review notes from CRO's interview with former iCap employee.	0.30	127.50
12/22/2023	ASW	Review witness interview.	0.30	NO CHARGE
	AJK	Telephone conference with Committe member and J. Bender (1.1); Telephone conference with J. Bender re same (.2).	1.30	812.50
12/27/2023	AJK	Emails with counsel for Committee member re committee issue (.1); Telephone conference with counsel for Committee member and J. Bender re same (.4); Review emails with Committee members and portion of Bylaws (.6).	1.10	687.50
SUBTOTAL:			[ 38.90	20,935.00]
<u>LITIGATION</u>				
12/1/2023	AJK	Emails with J. Gurule and L. Miller re filing notice of stay in state court litigation.	0.20	125.00
12/4/2023	JW	Litigation strategy call with debtors' professionals and committee's professionals.	1.20	510.00
12/5/2023	AJK	Telephone call with J. Bender re stay of State Court litigation/Colpitts (.2); Review discovery emails from third party (.2); Telephone call with L. Miller, J. Gurule, J. Bender re Estate Litigation and planning issues (.5); Review updated list of litigation hold notices and emails re same (.2).	1.10	687.50
12/6/2023	AJK	Emails with L. Miller, J. Bender, J. Gurule, S. Freeman re discussions on handling and allocating litigation efforts (.2); Telephone call with J. Bender re same (.3).	0.50	312.50

ICAP CREDITORS  
COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/8/2023	AJK	Emails with M. Pendergrast re discovery/protection order issues (.1); Email with J. Bender re 2004/discovery issues (.1).	0.20	125.00
12/10/2023	AJK	Telephone call with J. Bender re allocation of litigation efforts and tasks re third party claims.	0.80	500.00
12/12/2023	AJK	Email with J. Gurule re litigation issues for discussion (.1); Conference call with L. Miller, J. Gurule, J. Bender re discussion of third party litigation issues and approach (.7).	0.80	500.00
12/15/2023	AJK	Telephone call with J. Gurule and J. Bender re litigation issues for discussion (.1); Conference call with CRO team and J. Bender re coordination of litigation approach, allocation of work tasks and strategy (1.2).	1.30	812.50
12/18/2023	JW	Review and comment on proposed 2004 RFPs to litigation targets associated with iCap.	0.30	127.50
	AJK	Revise draft 2004 Exam Requests for Production to third party (.5); Emails with CRO counsel re coordination of issues b/w CRO and Committee (.1).	0.60	375.00
12/19/2023	AJK	Emails with J. Bender re discussion of litigation allocation issues involving CRO and Committee.	0.30	187.50
12/20/2023	AJK	Travel to LA for meetings (NO CHARGE); Meeting with L. Miller, J. Gurule, J. Bender, S. Freeman re pending litigation issues/discussions (.9); Meeting with J. Bender and S. Freeman re follow up/Committee issues re same (.6).	1.50	937.50
12/22/2023	AJK	Read summary of interviews with third parties (.2); Email with J. Gurule re pending litigation issues/discussions (.1); Email with J. Wax re research relating to application of stay (.1); Review drafts from CRO counsel re litigation issues (.2); Emails with J. Bender and S. Freeman re Umpqua 2004 (.2).	0.80	500.00

ICAP CREDITORS  
COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/24/2023	AJK	Telephone conference with J. Gurule re litigation issues and terms of consensual approach b/w debtors and Committee.	0.90	562.50
12/27/2023	AJK	Telephone conference with J. Bender re terms of litigation approach b/w debtors/CRO and Committee.	0.50	312.50
12/28/2023	AJK	Work on draft of terms of litigation agreement between Committee and CRO.	0.40	250.00
SUBTOTAL:			[ 11.40	6,825.00]
<u>REAL ESTATE</u>				
12/2/2023	ASW	Review property summary re Camas and emails re same with J. Beckett, L. Miller.	0.30	157.50
	ASW	Review corporate filings re Camas real estate entities.	0.60	315.00
12/3/2023	ASW	Review and respond to emails re approach re Camas properties.	0.20	105.00
12/4/2023	ASW	Video conference with real estate task force re real estate valuations and sales efforts/planning.	0.80	420.00
12/5/2023	ASW	Edits to real estate title summary for sub committee use and review.	1.60	840.00
	ASW	Research re potential Purchase and Sale Agreement rejection issues and work on memo re same.	3.20	1,680.00
	ASW	Review WAC re excise taxes and emails with real estate group re same.	0.20	105.00
	AJK	Emails with CRO and Committee professionals re Camas Meadows properties (.1); Review detailed list of historical iCap real estate transactions (.5).	0.60	375.00
12/8/2023	ASW	Review Committee communication re Senza sale and conferences with A. J. Kornfeld re same.	0.90	472.50



ICAP CREDITORS  
COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/8/2023	ASW	Memo re proposed Senza sale expense reimbursements and administrative expense subcomponents.	0.60	315.00
	ASW	Review Senza sale pleadings re background discussion.	0.40	210.00
12/9/2023	AJK	Conference with A. S. Willig re issues related to Senza property.	0.20	125.00
12/10/2023	AJK	Review Senza bankruptcy schedules and Statement of Financial Affairs re financial details (.3); Review DIP order re treatment of Senza proceeds (.1).	0.40	250.00
12/11/2023	ASW	Review title report, valuation information, Purchase and Sale Agreement and prepare memo re VH 2nd Street property.	1.40	735.00
	ASW	Review title report, valuation information, Purchase and Sale Agreement and prepare memo re Pioneer property.	1.60	840.00
	ASW	Telephone conference with and emails with S. Freeman re VH 2nd Street and Pioneer.	0.40	210.00
	AJK	Telephone call with S. Freeman and A. S. Willig re Senza property (.4); Email with L. Miller re same (.1); Email with S. Freeman and A. S. Willig re same (.2); Review DIP Agreement re Second Street and Pioneer properties (.1); Email with L. Miller re potential third party/portfolio approach re real estate (.1).	0.90	562.50
12/12/2023	ASW	Weekly real estate task force video call.	0.70	367.50
	ASW	Emails with P. Elkin re VH 2nd Street property.	0.20	105.00
12/13/2023	ASW	Review emails with P. Elkin, J. Rader, S. Freeman re proposed real estate sales.	0.40	210.00
12/19/2023	ASW	Review email exchanges re real estate status and attend weekly call re real estate tasks and issues.	0.70	367.50

ICAP CREDITORS  
COMMITTEE

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			<u>Hours</u>	<u>Amount</u>
12/20/2023	ASW	Work on real estate summary as to valuations, encumbrances, status of approaches and disposition.	3.40	1,785.00
12/26/2023	ASW	Review J. Beckett email re real estate valuations.	0.30	157.50
	ASW	Review J. Beckett email with updated report.	0.40	210.00
		SUBTOTAL:	[ 20.40	10,920.00]
		For professional services rendered		\$48,887.50
		Additional charges:		
			<u>Price</u>	
12/20/2023	CKP	A. J. Kornfeld flight to CA	717.80	717.80
	CKP	A. J. Kornfeld transportation in CA	54.00	54.00
	CKP	A. J. Kornfeld hotel stay in CA	378.00	378.00
		Total costs		\$1,149.80
		Total amount of this bill		\$50,037.30
		<b>Balance due</b>		<b>\$50,037.30</b>

HONORABLE WHITMAN L. HOLT

ARMAND J. KORNFELD, WSBA #17214  
AIMEE S. WILLIG, WSBA #22859  
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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In re

ICAP ENTERPRISES, INC., et al.,  
Debtors.<sup>1</sup>

No. 23-01243-WLH11  
(Jointly Administrated)

NOTICE OF THIRD MONTHLY  
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TO: THE DEBTORS, THE OFFICE OF THE UNITED STATES TRUSTEE, AND  
OTHER PARTIES IN INTEREST

PLEASE TAKE NOTICE that the professionals listed on the chart below (the “Professionals”) have applied to the United States Bankruptcy Court for the Eastern District of Washington for allowance and payment of interim compensation for services rendered and reimbursement of expenses incurred during the period commencing December 1, 2023 and ending December 31, 2023 (the “Application Period”). As detailed below, the Professionals seek allowance and payment of interim compensation for fees of services rendered, plus the expenses incurred during the Application Period.

Professional’s Name	Title	Toal (100%) Fees Incurred	Total Requested in this Application (100% of Fees and Expenses)	Amount of Fees to be Applied to Open Invoices (80% of Fees)	Amount of Fees to be Held in Trust (20% of Fees)
Armand J. Kornfeld	Partner	\$26,437.50	\$26,437.50	\$21,149.60	\$5287.40
Aimee S. Willig	Partner	\$14,332.50	\$14,332.50	\$11,466.00	\$2,866.50
Jason Wax	Associate	\$8,117.50	\$8,117.50	\$6,494.00	\$1,623.50
General Expenses			\$1,149.80		
<b>TOTAL</b>		\$48,887.50	\$50,037.30	\$39,109.60	\$9,777.40

Pursuant to the Order Granting Debtors’ Motion For Order Establishing Interim Fee Application and Expense Reimbursement Procedures which was entered by the court on November 17, 2023 [ECF No. 168], any party objecting to the allowance and payment of interim compensation and reimbursement of expenses as requested must file a written objection with the court and serve a copy of that objection upon the Professionals whose Monthly Fee Application are the subject of the objection, the

1 Debtors and their counsel of record, the Office of the United States Trustee within  
2 fourteen (14) calendar days of the date that this Notice was mailed.

3 If an objection is timely filed and served, the **Debtors** will pay the Professionals  
4 whose application is the subject of an objection only the applicable percentage of those  
5 amounts not in dispute and will reserve any amounts in dispute for payment after the  
6 Court hears and resolves such dispute.

7 DATED this 17<sup>th</sup> day of January, 2024.

8 BUSH KORNFELD LLP

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10 By /s/ Armand J. Kornfeld  
Armand J. Kornfeld, WSBA #17214  
Aimee S. Willig, WSBA #22859  
11 Jason Wax, WSBA #41944  
12 *Attorneys for The Official Unsecured Creditors Committee*  
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